

**IN THE UNITED STATES BANKRUPTCY COURT
OF THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	
CYNTHIA LYNN CRAIG-HALBLEIB	:	Case No: 1-20-bk-00836-HWV
Debtor	:	
	:	
	:	Chapter 13
THE MONEY SOURCE, INC.	:	
Movant	:	
	:	
	:	
v.	:	
	:	
CYNTHIA LYNN CRAIG-HALBLEIB	:	
Debtor	:	
	:	
KEITH CRAIG-HALBLEIB	:	
Co-Debtor	:	
	:	
CHARLES J. DEHART, III	:	
Trustee	:	

**DEBTOR'S ANSWER TO MOVANT'S MOTION FOR RELIEF FROM THE
AUTOMATIC STAY**

AND NOW COMES, Debtor, Cynthia Lynn Craig-Halbleib by and through her attorneys, Jacobson, Julius & Harshberger, and hereby file this Answer to Movant's Motion for Relief from the Automatic Stay and in support thereof states as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted upon information and belief.
5. Admitted.
6. Admitted in part and denied in part. It is admitted that Debtor is behind. It is denied

as the amount in Movant's motion. By way of additional response, Debtor is hopeful that that

Movant will allow Debtor to place the arrears into an amended Chapter 13 plan once the correct amount has been determined.

7. Admitted in part and denied in part. It is admitted that Debtor is behind. It is denied as the amount in Movant's motion. By way of additional response, Debtor is hopeful that that Movant will allow Debtor to place the arrears into an amended Chapter 13 plan once the correct amount has been determined.

8. Paragraph 8 is a conclusion of law to which no response is required. To the extent a response is required, said averment is denied.

9. Admitted. Debtor was impacted by the COVID-19 Pandemic and is currently preparing an amended plan to get current with the Chapter 13 Trustee.

10. Paragraph 10 is a conclusion of law to which no response is required. To the extent a response is required, said averment is denied.

WHEREFORE, Debtors respectfully request that this Honorable Court deny Movant's Motion for Relief from the Automatic Stay and further requests any other relief deemed necessary and just.

Respectfully Submitted,

JACOBSON, JULIUS & HARSHBERGER

Dated: February 2, 2021

/s/Chad J. Julius
ID# 209496
8150 Derry Street
Harrisburg, PA 17111.5260
717.909.5858

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	:	
CHARLES J. DEHART, III	:	
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CERTIFICATE OF SERVICE

I, Dera Shade, paralegal with Jacobson, Julius & Harshberger, do hereby certify that on this day I served the within Respondent's Answer to Movant's Motion for Relief from the Automatic Stay upon the following persons via the ECF/CM system and/or by depositing a true and correct copy of the same in the United States Mail, first class, postage prepaid:

ECF/CM:

Charles J. Dehart III, Esquire (Trustee) PO Box 7005 Lancaster, PA 17604	Rebecca A. Solarz, Esquire KML Law Group, P.C. Suite 500 – BNY Independence Center 701 Market Street Philadelphia, PA 19106
United States Bankruptcy Court Ronald Reagan Federal Building 228 Walnut Street, Room 320 Harrisburg, PA 17108	

/s/Dera Shade
 Dera Shade, Paralegal
 Jacobson, Julius & Harshberger
 8150 Derry Street
 Harrisburg, PA 17111
 717.909.5858
 FAX: 717.909.7788
 Email: dshade@ljacobsonlaw.com

Dated: February 2, 2021